

74712-3

10/21/2013

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 21 2013

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

J. Michael Kelley, Ph.D.
Agent for Special Materials Company
Toxcel
7140 Heritage Village Plaza
Gainesville, Virginia 20156

Subject: Changing Primary Brand Name and Remove Duplicate "Keep Out of Reach of Children" Statement
EPA Reg. No. 74712-3
Notification Letter Dated September 4, 2013

This letter acknowledges receipt of the Notification identified above submitted under the provisions of section 3(c)(9) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended and PR Notice 98-10. This Notification requests to add "AVANCID 75" as the primary brand name and remove the duplicate "Keep Out of Reach of Children" statement.

Based on a review of the submitted information, this notification is acceptable. This information has been made a part of your file.

Should you have any questions concerning this letter, please contact Elizabeth Watkins at (703) 347-0241.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth H. Watkins for".

Marshall Swindell
Product Manager (33)
Regulatory Management Branch 1
Antimicrobials Division (7510P)

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide – Section 1

1. Company/Product Number 74712 / 3	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Special Materials Company / THPS 75	PM Number 33	
5. Name And Address Of Applicant (Include ZIP Code) Special Materials Company 70 West 40th Street New York, NY 10018 <input checked="" type="checkbox"/> Check if this is a new address (NOTE: change recorded; new to label)	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final Printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain Below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of Primary Brand Name Change to AVANCID® 75.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" No. per Unit Packaging wgt. Container	If "Yes" No. per Unit Packaging wgt. Container	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____					

Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name J. Michael Kelley, Ph.D.	Title Authorized Representative for Special Materials Company	Telephone No. (Include Area Code) 703-754-6248 x 112
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received
2. Signature 	3. Title Authorized Representative for Special Materials Company	
4. Typed Name J. Michael Kelley, Ph.D.	5. Date September 4, 2013	

toXcel

Toxicology & Regulatory Affairs

7140 Heritage Village Plaza

Gainesville, VA 20155

USA

Phone: 703-754-0248

Fax: 703-310-6950

Hand Delivered

September 4, 2013

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room S-4900, 4th Floor, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

**RE: Notification of Primary Brand Name Change per PR Notice 98-10
(THPS 75 / 74712-3)**

Dear Mr. Swindell,

On behalf of Special Materials Company, toXcel is submitting a notification to change the emergency contact phone number and Primary Brand Name for THPS 75 (EPA Reg. No. 74712-3) to the new Primary Brand Name, AVANCID® 75, and remove the unnecessary KORC statement inside the precautionary statement box. The enclosed label includes revised language to reflect the change in brand name and supercedes the existing label on file with the Agency.

Current Primary Brand Name: THPS 75

New Primary Brand Name: AVANCID® 75

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you have any questions about the information provided, please do not hesitate to contact me via email at Mike.Kelley@toxcel.com or by phone at (703) 754-0248 x112.

Sincerely,



Mike Kelley
Authorized Representative, Special Materials Company

cc: Phil Ostrowski (Special Materials)
Adam Feldman (Special Materials)

KEEP OUT OF REACH OF CHILDREN

DANGER

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

Danger: Corrosive. Causes irreversible eye damage. May be fatal if swallowed. Harmful if inhaled. Harmful if absorbed through the skin. Do not get in eyes, on skin, or on clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Avoid breathing vapor or spray. Wear long sleeved shirt and pants or coveralls, goggles or face, shield, and chemical resistant gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum and using tobacco or using the toilet. Remove and wash contaminated clothing before use.

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User Safety Recommendations

Users must remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users must wash hands before eating, drinking, chewing gum, or using the toilet. Users must remove PPE immediately after handling this product. Wash outside of gloves before removing. As soon as possible, ~~wash~~ wash thoroughly. If no such instructions exist for washables, use detergent and hot water. Keep an washing PPE separately from other laundry.

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ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

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DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

OIL FIELD AND PETROCHEMICAL OPERATIONS

THPSAVANCID® 75 is effective in controlling the growth of sulfate reducing bacteria, general aerobic bacteria, and microorganisms that contribute to biofilm formation in oil field recovery, processing and distribution applications and supporting systems; such as injection water, water holding tanks, disposal well water, recirculating water handling systems, and pipelines. **THPSAVANCID® 75** has been shown to dissolve iron sulfide and sequester iron when used under these conditions, leading to improvements in pump and filter life, injectivity, oil water separation, and reduction of sheen.

THPSAVANCID® 75 is also effective for use in controlling microbial growth in fluids used for drilling and stimulation of oil and gas formations.

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Produced and Injection Water Treatment

THPSAVANCID® 75 should be added to a produced or injection water system at a point where uniform mixing will occur.

Initial Treatment:

For a noticeably fouled system, add 93-350 ppm THPSAVANCID® 75. When added to a flowing system, shock dose for 2-6 hours based on flow rates. Repeat as necessary until control is achieved.

Subsequent Treatment:

Once control has been achieved, add 14-98 ppm THPSAVANCID® 75 weekly or as needed to maintain control. When added to a flowing system, shock dose for 2-6 hours based on flow rates.

Continuous Treatment:

THPSAVANCID® 75 can be dosed continuously at a level of 14-67 ppm.

Transmission Pipelines and Systems

THPSAVANCID® 75 should be added at a point in the pipeline where uniform mixing will occur. The application should be conducted to ensure maximum distribution of product through the internal surface of the pipeline by adding an amount of biocide which eventually comes out the other end of the pipeline. Criteria for success of the treatment will be reduction in bacterial count and/or corrosion rates.

Slug Dosing:

Follow instructions for injection water treatment.

Continuous Dosing:

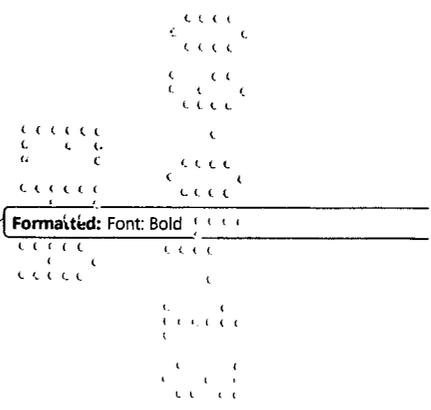
THPSAVANCID® 75 can be dosed continuously at a level of 14-100 ppm.

Drilling Muds, Packer Fluids, Completion and Workover Fluids:

Add THPSAVANCID® 75 at a point where uniform mixing will occur. Add 33-1400 ppm of product to a freshly prepared fluid depending on severity of contamination.

Gas Storage Wells and Systems

Individual wells should be treated in the same manner and at the same application rates as described under Water Floods. Individual drips should be treated with a sufficient quantity of product to produce



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a concentration of 33.3-133.3 ppm when diluted by the water present in the drip. Repeat as needed to maintain control.

Well Remediation Operations

Individual production or injection wells may be bullheaded with THPSAVANCID® 75% to control bacteria and dissolve iron sulfide deposits. Pump the product into the well as an aqueous solution containing from 13.3 to 40% THPSAVANCID® 75%. The well should be shut in for at least 6 hours before putting it back into operation.

Hydrotesting

Water used to hydrotest pipelines or vessels should contain 66.6-666.5 ppm THPSAVANCID® 75%, depending on water quality and length of time the equipment will remain idle.

Pipeline Pigging and Scraping

Add THPSAVANCID® 75% to a slug of water contained between the scraper and the trailing pig to produce a concentration of 70-700 ppm in the water at the discharge point or pig trap, depending on the length of the pipe and the severity of biofouling.

Note: For cooling water systems of equal to or greater than 4000 gallons, do not apply by open pouring of liquid ~~to~~ cooling water systems; a metering pump delivery system is required for this use and application method.

INDUSTRIAL AND/OR COMMERCIAL RECIRCULATING COOLING WATER SYSTEMS (for control of bacteria, fungi, and algae)

Initial Slug Dose: Add 133.3-1000 ppm THPSAVANCID® 75% based on total water volume. Repeat until control is obtained.

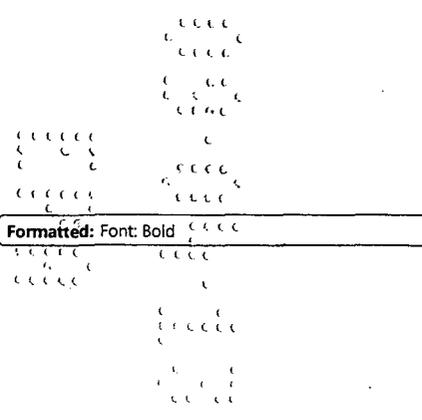
Subsequent Treatment: Add either **intermittently** 33.3-400 ppm of THPSAVANCID® 75% or **continuously** 20-67 ppm THPSAVANCID® 75%. Dirty systems must be cleaned prior to treatment.

HEAT TRANSFER SYSTEMS (Evaporative ~~Condensers~~ Condensers, Dairy Sweetwater Systems, Hydrostatic Sterilizers and Retorts, Brewery and Other Pasteurizers, and Warmers).

Add THPSAVANCID® 75% at the same application rates, and in the same manner as described for recirculating cooling water. Add to the system at a point where uniform mixing and circulation will occur.

AIR WASHER SYSTEMS

For control of bacteria and fungi. Pre-clean the system with detergent and allow air washer to run with fan on for two hours. Flush and check nozzles, manually cleaning as necessary. Add 50-133.3



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ppm **THPSAVANCID® 75%** at a point where uniform mixing and even distribution will occur. Repeat as needed to maintain control.

FIRE PROTECTION SYSTEMS

THPSAVANCID® 75% is effective at controlling microbial growth in waters and on pipe surfaces in fire protection systems. Such microbial growth when combined with other forms of corrosion can lead to accelerated corrosion rates and pitting corrosion, commonly referred to as microbiologically influenced corrosion. **THPSAVANCID® 75%** also helps to remove free oxygen from the water, thus eliminating an important nutrient for bacteria and an important reactant in many corrosion reactions.

THPSAVANCID® 75% should be added to a fire protection system using a chemical metering pump. Inject at a point, such as a riser, manifold, or makeup feed water line, where uniform mixing and even distribution will occur. Add 100-400 ppm **THPSAVANCID® 75** (~~75-300 ppm THPS~~) depending on severity of contamination in the system. Repeat as needed.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store this product in a cool, dry area away from direct sunlight and heat to avoid deterioration. Keep container tightly closed when not in use. In case of a spill, flood the area with large quantities of water.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

CONTAINER Disposal: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

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